

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**DEBORAH A. WILLIAMS**

**CASE 17-12464**

**DEBTOR**

**CHAPTER 13**

**Judge Jeffery P. Hopkins**

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**IN RE:**

**DEBORAH A. WILLIAMS  
248 Baxter Ave  
Cincinnati, Ohio 45220**

**ADVERSARY #18-01001**

**PLAINTIFF**

**VS**

**City of Cincinnati  
c/o City Solicitor  
801 Plum Street, 214 City Hall  
Cincinnati, Ohio 45202**

**Lot King Development Co. dba Affordable  
5966 Stewart Road  
Cincinnati, Ohio 45227**

**M&T Bank  
PO Box 840  
Buffalo, NY 14240**

**Seterus  
PO Box 1077  
Hartford, CT 06143**

**State of Ohio  
Department of Taxation  
PO Box 530  
Columbus, Ohio 43266**

**Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346**

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**Ohio Dept of Taxation  
30 E. Broad Street, 21<sup>st</sup> Floor  
Columbus, Ohio 43215**

**Advantage Funding Commercial Capital  
1111 Marcus Ave  
Lake Success, NY 11042**

**Cincinnati Water Works  
Bankruptcy Desk  
4747 Spring Grove Ave  
Cincinnati, Ohio 45232**

**Duke Energy  
139 E. 4<sup>th</sup> Street  
Atrium II, 25<sup>th</sup> Floor  
PO Box 960  
Attn: Tanya Schweitzer, Legal Dept  
Cincinnati, Ohio 45202**

**GM Financial  
6400 Main Street #201  
Buffalo, NY 14221**

**Good Samaritan Hospital  
Patient Accounts  
619 Oak Street  
Cincinnati, Ohio 45206**

**Qualified Emergency Specialists  
1472 Solutions Center  
Chicago, IL 60677-1044**

**TriHealth Physicians  
PO Box 636556  
Cincinnati, Ohio 45263**

**Defendants**

**Also Serve:**

**Office of the District Counsel  
312 Elm Street #2350  
Cincinnati, Ohio 45202**

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**US Attorney  
221 E. Fourth Street #400  
Cincinnati, Ohio 45202**

**Ohio Attorney General  
30 E Broad Street  
14<sup>th</sup> Floor  
Columbus, Ohio 43215**

**Scott Gilbert  
8135 Cabinet Circle  
Cincinnati, Ohio 45244**

**Douglas Haessing  
Reimer Arnovitz Chernek & Jeffrey Co  
PO Box 39696  
Solon, Ohio 44139**

**Manley Deas & Kochalski LLC  
PO Box 16508  
Columbus, Ohio 43216**

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**MOTION FOR DEFAULT JUDGMENT**

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Comes now the Plaintiff and hereby moves for a Default Judgment in the within Adversary. This motion is supported by the attached Memorandum.

*/s/ Eric W. Goering*  
Eric W. Goering 0061146  
220 W. Third Street  
Cincinnati, Ohio 45202  
(513)621-0912

**MEMORANDUM**

Debtor filed a Chapter 13 Bankruptcy on July 5, 2017. The within Adversary was commenced on January 5, 2018. Notices were sent by the Plaintiff and by the Court to all interested parties. The Debtor entered into Agreed orders with Park National Bank and Santander Consumer USA Inc. and default is not requested against either party. To date, no Answers have been filed by any of the parties.

WHEREFORE, Plaintiff moves for a Default Judgment on the Complaint  
For Equitable Relief to Reinstate the Automatic Stay Under 11 USC 362.

*/s/ Eric W. Goering*  
Eric W. Goering

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION**

**IN THE MATTER OF:  
DEBORAH A. WILLIAMS**

**NO: 17-12464  
CHAPTER 13**

**Debtor**

**ADV# 18-1001  
Judge Jeffery P. Hopkins**

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**NOTICE OF MOTION FOR DEFAULT JUDGMENT**

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Attorney for Debtor has entered a Motion for Default Judgment.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the relief sought in the motion/objection, then on or before twenty-one (21) days from the date set forth in the certificate of service for the motion/objection, you must file with the court a response explaining your position by mailing your response by regular U.S. Mail to:

Clerk, U.S. Bankruptcy Court  
Atrium Two, Suite 800  
221 E. Fourth St.  
Cincinnati, Ohio 45202

OR your attorney must file a response using the court's ECF System.

Date: 03/23/18

The court must receive your response on or before the date above.

You must also send a copy of your response either by

- 1) the court's ECF System or by
- 2) regular U.S. Mail to:

Goering & Goering  
220 West Third Street  
Cincinnati, Ohio 45202

Margaret A. Burks  
Chapter 13 Trustee  
600 Vine Street #2200  
Cincinnati, OH 45202

U. S. Trustee  
36 E. 7th St.  
Cincinnati, Ohio 45202

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in this motion/objection and may enter an order granting the relief

Date: 03/01/18

GOERING & GOERING  
Attorneys for Debtor  
220 West Third Street  
Cincinnati, Ohio 45202  
(513) 621-0912

/s/ Eric W. Goering  
Eric W. Goering

CERTIFICATE OF SERVICE

I hereby certify that on March 1, 2018 a copy of the foregoing Motion for Default Judgment was served on the following registered ECF participants electronically through the court's ECF System at the email address registered with the court:

U.S. Trustee  
Margaret A. Burks  
Susan Argo  
Branson D. Dunlop  
John Jansing  
Cynthia A. Jeffrey  
Peter Michael O'Grady  
Raymond J Pikna, Jr.

And on the following by ordinary U.S. Mail addressed to:

City of Cincinnati  
c/o City Solicitor  
801 Plum Street, 214 City Hall  
Cincinnati, Ohio 45202

Lot King Development Co. dba Affordable  
5966 Stewart Road  
Cincinnati, Ohio 45227

M&T Bank  
PO Box 840  
Buffalo, NY 14240

Park National Bank  
720 East Pete Rose Way #100  
Cincinnati, Ohio 45202

Santander  
PO Box 560284  
Dallas, TX 75356

Seterus  
PO Box 1077  
Hartford, CT 06143

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State of Ohio  
Department of Taxation  
PO Box 530  
Columbus, Ohio 43266

Internal Revenue Service  
PO Box 7346  
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PO Box 39696  
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Susan Argo  
312 Walnut Street #1800  
Cincinnati, Ohio 45202

John Jansing  
Altick & Corwin  
One South Main Street #1590  
Dayton, Ohio 45402

Manley Deas & Kochalski LLC  
PO Box 16508  
Columbus, Ohio 43216

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*/s/ Eric W. Goering*  
Eric W. Goering